

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Zohar III, Corp., *et al.*,¹

Debtors.

ZOHAR CDO 2003-1, LIMITED; ZOHAR II
2005-1, LIMITED; and ZOHAR III, LIMITED;
ZOHAR II 2005-1, CORP.,

Plaintiffs,

-against-

PATRIARCH PARTNERS, LLC;
PATRIARCH PARTNERS VIII, LLC;
PATRIARCH PARTNERS XIV, LLC;
PATRIARCH PARTNERS XV, LLC;
PHOENIX VIII, LLC; OCTALUNA LLC;
OCTALUNA II LLC; OCTALUNA III LLC;
ARK II CLO 2001-1, LIMITED; ARK
INVESTMENT PARTNERS II, LP; ARK
ANGELS VIII, LLC; PATRIARCH PARTNERS
MANAGEMENT GROUP, LLC; PATRIARCH
PARTNERS AGENCY SERVICES, LLC; and
LYNN TILTON,

Defendants, and

180S, INC.; BLACK MOUNTAIN DOORS,
LLC; CROSCILL HOME, LLC; DURO
TEXTILES, LLC; GLOBAL AUTOMOTIVE
SYSTEMS, LLC; HERITAGE AVIATION,
LTD.; INTREPID U.S.A., INC.; IMG
HOLDINGS, INC.; JEWEL OF JANE, LLC;
MOBILE ARMORED VEHICLES, LLC;
SCAN-OPTICS, LLC; SILVERACK, LLC;
STILA STYLES, LLC; SNELLING STAFFING,
LLC; VULCAN ENGINEERING, INC; and
XPIENT SOLUTIONS, LLC,

Nominal Defendants.

Chapter 11

Case No. 18-10512 (KBO)

Jointly Administered

Adversary No. 20-50534 (KBO)

Re: Adv. Docket No. 188

¹ The “Debtors,” and, where applicable, the last four digits of their taxpayer identification number are as follows: Zohar III, Corp. (9612), Zohar II 2005-1, Corp. (4059), Zohar CDO 2003-1, Corp. (3724), Zohar III, Limited (“Zohar III”) (9261), Zohar II 2005-1, Limited (“Zohar II”) (8297), and Zohar CDO 2003-1, Limited (together with Zohar II and Zohar III, the “Zohar Funds” or the “Funds”) (5119). The Debtors’ address is c/o FTI Consulting, Inc., 1166 Avenue of the Americas, 15th Floor, New York, NY 10036.

PATRIARCH PARTNERS VIII, LLC;
PATRIARCH PARTNERS XIV, LLC;
PATRIARCH PARTNERS XV, LLC;
OCTALUNA LLC; OCTALUNA II LLC;
OCTALUNA III LLC; PATRIARCH
PARTNERS AGENCY SERVICES, LLC; and
PATRIARCH PARTNERS, LLC,

Counterclaim and Third-
Party Claimants,

-against-

ZOHAR CDO 2003-1, LIMITED; ZOHAR CDO
2003-1, CORP.; ZOHAR II 2005-1, LIMITED;
ZOHAR II 2005-1, CORP.; ZOHAR III,
LIMITED; ZOHAR III, CORP.,

Counterclaim and Third-
Party Defendants.

**NOTICE OF FILING OF PROPOSED REDACTED VERSION OF
DEFENDANTS' SECOND AMENDED ANSWER TO THE CORRECTED
SECOND AMENDED COMPLAINT AND DEFENDANTS' AMENDED
COUNTERCLAIMS AND THIRD-PARTY CLAIMS**

PLEASE TAKE NOTICE that, on June 18, 2022, the **Defendants' Second Amended Answer to the Corrected Second Amended Complaint and Defendants' Amended Counterclaims and Third-Party Claims** [Adv. Docket No. 188] (the "Second Amended Answer") was filed under seal with the Court.

PLEASE TAKE FURTHER NOTICE that pursuant to Del. Bankr. L.R. 9018-1(d)(ii), attached hereto as Exhibit A is the proposed redacted public version of the Second Amended Answer.

Dated: July 28, 2022

COLE SCHOTZ P.C.

By: /s/ G. David Dean
Norman L. Pernick (No. 2290)
G. David Dean (No. 6403)
Patrick J. Reilley (No. 4451)
500 Delaware Avenue, Suite 1410
Wilmington, DE 19801
Telephone: (302) 652-3131
Facsimile: (302) 652-3117
npernick@coleschotz.com
ddean@coleschotz.com
preilley@coleschotz.com

– and –

SHER TREMONTE LLP

Theresa Trzaskoma (Admitted Pro Hac Vice)
Max Tanner (Admitted Pro Hac Vice)
Vikram Shah (Admitted Pro Hac Vice)
90 Broad Street, 23rd Floor
New York, New York 10004
Telephone: (212) 202-2600
Facsimile: (212) 202-4156
ttrzaskoma@shertremonte.com
mtanner@shertremonte.com
vshah@shertremonte.com

*Counsel to Lynn Tilton, Patriarch Partners, LLC,
Patriarch Partners VIII, LLC, Patriarch Partners
XIV, LLC, Patriarch Partners XV, LLC, Phoenix
VIII, LLC, Octaluna LLC, Octaluna II LLC,
Octaluna III LLC, Ark II CLO 2001-1, Ltd., Ark
Investment Partners II, LP, Ark Angels VIII, LLC,
Patriarch Partners Management Group, LLC, and
Patriarch Partners Agency Services, LLC*